

EXHIBIT N

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA

3 JANE DOE NO. 2, Case No: 08-CV-80119
4 Plaintiff,
5 Vs
6 JEFFREY EPSTEIN,
7 Defendant.

_____ /

8 JANE DOE NO. 3, Case NO: 08-CV-80232

9 Plaintiff,
10 Vs
11 JEFFREY EPSTEIN,
12 Defendant.

_____ /

13 JANE DOE NO. 4, Case No: 08-CV-80380

14 Plaintiff,
15 Vs.

16 JEFFREY EPSTEIN,
17 Defendant.

18 _____ /

19 JANE DOE NO. 5, Case No: 08-CV-80381
20 Plaintiff,

21 Vs
22 JEFFREY EPSTEIN,
23 Defendant.

_____ /

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25

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<p>Page 2</p> <p>1 JANE DOE NO. 6, Case No: 08-CV-80994 2 Plaintiff, 3 Vs 4 JEFFREY EPSTEIN, 5 Defendant.</p> <p>6 JANE DOE NO. 7, Case No: 08-CV-80993 7 Plaintiff, 8 Vs 9 JEFFREY EPSTEIN, 10 Defendant.</p> <p>11 C.M.A., Case No: 08-CV-80811 12 Plaintiff, 13 Vs 14 JEFFREY EPSTEIN, 15 Defendant.</p> <p>16 JANE DOE, Case No: 08-CV-80893 17 Plaintiff, 18 Vs 19 JEFFREY EPSTEIN, 20 Defendant.</p> <p>21 22 23 24 25</p>	<p>Page 4</p> <p>1 VIDEOTAPED 2 DEPOSITION 3 of 4 ALFREDO RODRIGUEZ</p> <p>5 6 taken on behalf of the Plaintiffs pursuant 7 to a Re-Notice of Taking Deposition (Duces Tecum)</p> <p>8 9 ---</p> <p>10 APPEARANCES:</p> <p>11 12 MERMELSTEIN & HOROWITZ, P.A. 13 BY: STUART MERMELSTEIN, ESQ. 14 18205 Biscayne Boulevard 15 Suite 2218 16 Miami, Florida 33160 17 Attorney for Jane Doe 2, 3, 4, 5, 18 6, and 7.</p> <p>19 ROTHSTEIN ROSENFELDT ADLER 20 BY: BRAD J. EDWARDS, ESQ., and 21 CARA HOLMES, ESQ. 22 Las Olas City Centre 23 Suite 1650 24 401 East Las Olas Boulevard 25 Fort Lauderdale, Florida 33301 Attorney for Jane Doe and E.W. And L.M.</p> <p>PODHURST ORSECK BY: KATHERINE W. EZELL 25 25 West Flagler Street Suite 800 Miami, Florida 33130 Attorney for Jane Doe 101 and 102.</p>
<p>Page 3</p> <p>1 JANE DOE NO. II, Case No: 08-CV-80469 2 Plaintiff, 3 Vs 4 JEFFREY EPSTEIN, 5 Defendant.</p> <p>6 JANE DOE NO. 101, Case No: 09-CV-80591 7 Plaintiff, 8 Vs 9 JEFFREY EPSTEIN, 10 Defendant.</p> <p>11 JANE DOE NO. 102, Case No: 09-CV-80656 12 Plaintiff, 13 Vs 14 JEFFREY EPSTEIN, 15 Defendant.</p> <p>16</p>	<p>Page 5</p> <p>1 APPEARANCES:</p> <p>2 3 LEOPOLD-KUVIN 4 ADAM J. LANGINO, ESQ. 5 2925 PGA Boulevard 6 Suite 200 7 Palm Beach Gardens, Florida 33410 8 Attorney for B.B.</p> <p>9 RICHARD WILLITS, ESQ. 10 2290 10th Avenue North 11 Suite 404 12 Lake Worth, Florida 33461 13 Attorney for C.M.A.</p> <p>14 BURMAN, CRITTON, LUTTIER & 15 COLEMAN, LLP 16 BY: ROBERT CRITTON, ESQ. 17 515 North Flagler Drive 18 Suite 400 19 West Palm Beach, Florida 33401 20 Attorney for Jeffrey Epstein.</p>
<p>17 18 19 20 1031 Ives Dairy Road 21 Suite 228 22 North Miami, Florida 23 July 29, 2009 24 11:00 a.m. to 5:30 p.m. 25</p>	<p>16 ALSO PRESENT:</p> <p>17 JOE LANGSAM, VIDEOGRAPHER</p> <p>18 19 ---</p> <p>20 21 22 23 24 25</p>

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<p style="text-align: right;">Page 6</p> <p>1 INDEX OF EXAMINATION</p> <p>2</p> <p>3 WITNESS DIRECT CROSS</p> <p>4 ALFREDO RODRIGUEZ</p> <p>5 (By Mr. Mermelstein) 12</p> <p>6 (By Mr. Edwards) 157</p> <p>7 (By Mr. Langino) 260</p> <p>8</p> <p>9</p> <p>10 INDEX OF EXHIBITS</p> <p>11 EXHIBITS PAGE</p> <p>12 1 Message pad 72</p> <p>13 2 Documents 115</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 8</p> <p>1 Doe right here on the copy you gave me. I'm</p> <p>2 missing which Jane Doe this is.</p> <p>3 They're all different case numbers. Do</p> <p>4 you want me to go through each case number?</p> <p>5 MR. CRITTON: I'm going to note my</p> <p>6 objection. Obviously if this deposition</p> <p>7 gets played -- not obviously, I'm going to</p> <p>8 object to the litany of each one so I don't</p> <p>9 know how we can separate it out. Maybe if</p> <p>10 and when at the time of trial and depending</p> <p>11 on how the Court determines what comes in</p> <p>12 and what doesn't with regard to the</p> <p>13 consolidated aspects of this. I have no</p> <p>14 great idea other than just saying Jane Doe</p> <p>15 versus Epstein, et al, or something like</p> <p>16 that, or Jane Doe, et al.</p> <p>17 MS. EZELL: Couldn't we just say and</p> <p>18 those cases which have been consolidated</p> <p>19 with it for Discovery purposes?</p> <p>20 MR. EDWARDS: Although there is cases</p> <p>21 here that have cross noticed this from state</p> <p>22 court that haven't been consolidated so that</p> <p>23 may not work. You may have to read them</p> <p>24 all, if it works out your way that will just</p> <p>25 get edited out, at least he will have read</p>
<p style="text-align: right;">Page 7</p> <p>1 Deposition taken before MICHELLE PAYNE, Court</p> <p>2 Reporter and Notary Public in and for the State of</p> <p>3 Florida at Large, in the above cause.</p> <p>4 - - -</p> <p>5 THE VIDEOGRAPHER: This is the case of</p> <p>6 Jane Doe No. 2, plaintiff, versus Jeffrey</p> <p>7 Epstein, defendant. Jane Doe No. 3,</p> <p>8 plaintiff, versus Jeffrey Epstein,</p> <p>9 defendant. Jane Doe No. 4, plaintiff,</p> <p>10 versus Jeffrey Epstein, defendant. And Jane</p> <p>11 Doe No. 5, plaintiff, versus Jeffrey</p> <p>12 Epstein, defendant. Jane Doe No. 6,</p> <p>13 plaintiff, versus Jeffrey Epstein,</p> <p>14 defendant. Jane Doe No. 7, plaintiff,</p> <p>15 versus Jeffrey Epstein, defendant. CMA,</p> <p>16 plaintiff, versus Jeffrey Epstein,</p> <p>17 defendant. And Jane Doe, plaintiff, versus</p> <p>18 Jeffrey Epstein, et al, defendant. And Jane</p> <p>19 Doe -- is there a shorter thing that we can</p> <p>20 do here? It's also missing this one right</p> <p>21 here.</p> <p>22 MR. MERMELSTEIN: Do we have a problem</p> <p>23 with saying Jane Doe 2 and the Epstein and</p> <p>24 related cases?</p> <p>25 THE VIDEOGRAPHER: I'm missing this Jane</p>	<p style="text-align: right;">Page 9</p> <p>1 that caption, every caption. Right? Is</p> <p>2 there a better suggestion?</p> <p>3 MR. CRITTON: No. There may be a better</p> <p>4 suggestion if he starts this is such and</p> <p>5 such day, it's the deposition of Mr.</p> <p>6 Rodriguez in the case such and such, and we</p> <p>7 can almost fill it in depending on which</p> <p>8 tape it goes, how it fills in, at least</p> <p>9 we'll have the context of the first and</p> <p>10 depending on whether the Judge reads it in</p> <p>11 from a consolidated or they all come</p> <p>12 related, I have no great idea.</p> <p>13 MR. EDWARDS: I was thinking if he read</p> <p>14 every one of them and it was the seventh in</p> <p>15 line then you just would edit it so you</p> <p>16 would only read that one.</p> <p>17 MR. CRITTON: I'm okay with that too.</p> <p>18 THE VIDEOGRAPHER: On page number three</p> <p>19 there is something missing on the top here.</p> <p>20 Do you want me to read each case number</p> <p>21 separately?</p> <p>22 MR. MERMELSTEIN: I don't think it's</p> <p>23 necessary.</p> <p>24 MR. EDWARDS: I don't think it's</p> <p>25 necessary either.</p>

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<p style="text-align: right;">Page 26</p> <p>1 with a copy.</p> <p>2 Q. Were you the only one who was allowed to</p> <p>3 answer the phone?</p> <p>4 A. Yes.</p> <p>5 Q. I'm sorry, what would you do --</p> <p>6 A. I would leave it on the counter next to</p> <p>7 the kitchen so when I find that piece all crumbled</p> <p>8 I knew that Mr. Epstein saw the message, so we</p> <p>9 communicated like that.</p> <p>10 Q. Now, you mentioned Mr. Epstein would give</p> <p>11 you instructions during the course of the day.</p> <p>12 A. Through his assistant.</p> <p>13 Q. And his assistant was whom?</p> <p>14 A. Sarah Kellen.</p> <p>15 Q. But you didn't view her as your</p> <p>16 supervisor?</p> <p>17 A. She take orders from Mrs. Maxwell but she</p> <p>18 will tell me, Alfredo, we need to buy this, we</p> <p>19 need to do this, and so and so was coming. I</p> <p>20 couldn't talk directly to Mr. Epstein.</p> <p>21 Q. Okay. So any communications from Mr.</p> <p>22 Epstein always came through Ms. Kellen?</p> <p>23 A. Or from the office in New York. Lesley,</p> <p>24 his secretary, or somebody else, the comptroller,</p> <p>25 the architect, any lawyer.</p>	<p style="text-align: right;">Page 28</p> <p>1 A. Yes. Sometimes very short notice but,</p> <p>2 yes, I was.</p> <p>3 Q. So that varied?</p> <p>4 A. Yes.</p> <p>5 Q. Who would give you that notice?</p> <p>6 A. Mrs. Maxwell or Sarah or Larry, the</p> <p>7 pilot.</p> <p>8 Q. And then you would drive to pick them up</p> <p>9 at the airport?</p> <p>10 A. Yes.</p> <p>11 Q. And who traveled with him?</p> <p>12 A. The three pilots and some guests.</p> <p>13 Q. What do you mean by guests?</p> <p>14 A. He will have some friends from Harvard,</p> <p>15 he will have -- well, very important people that,</p> <p>16 you know, friends, acquaintances from New York or</p> <p>17 Europe because I was just told the number of</p> <p>18 people was coming on the plane.</p> <p>19 Q. Were there people who were employed by</p> <p>20 him who came regularly?</p> <p>21 A. Yes.</p> <p>22 Q. And who would they be?</p> <p>23 A. Like I said, they were the pilots, Larry</p> <p>24 Bisosky, George, and I don't remember the flight</p> <p>25 engineer, and he will have two girlfriends.</p>
<p style="text-align: right;">Page 27</p> <p>1 Q. Lawyer, what kind of instructions would</p> <p>2 you get from lawyers?</p> <p>3 A. We used to have a lot of time, for</p> <p>4 instance, the dock construction, you need to have</p> <p>5 a lot of permits in Palm Beach so they were there</p> <p>6 for that reason.</p> <p>7 Q. Okay. Now, so you would interact with</p> <p>8 the staff from New York and that would include I</p> <p>9 think you said Lesley?</p> <p>10 A. Lesley, Bella.</p> <p>11 Q. What was Lesley's position?</p> <p>12 A. Lesley is the secretary, secretary to Mr.</p> <p>13 Epstein.</p> <p>14 Q. Okay. Is that Lesley Groff?</p> <p>15 A. I believe it was, I don't remember the</p> <p>16 last name.</p>	<p style="text-align: right;">Page 29</p> <p>1 Q. The pilot would have two girlfriends?</p> <p>2 A. Mr. Epstein. This is all people coming</p> <p>3 in the plane together.</p> <p>4 Q. Right. What do you mean by girlfriends?</p> <p>5 A. Friends, you know, that he was always</p> <p>6 having friends that he will befriend in New York,</p> <p>7 I don't know, or some other places.</p> <p>8 But I was just told -- my concern was how</p> <p>9 many people I have to feed, how many cars do I</p> <p>10 need to transport these people from the airport to</p> <p>11 the house, and to arrange accommodations in the</p> <p>12 house.</p> <p>13 Q. What about Sarah Kellen, did she travel</p> <p>14 with him?</p> <p>15 A. Yes.</p> <p>16 Q. So she was on the plane?</p> <p>17 A. Yes.</p>
<p>17 Q. Bella, who was Bella?</p> <p>18 A. Bella was the assistant comptroller.</p> <p>19 Q. Anyone else that you dealt with in New</p> <p>20 York?</p> <p>21 A. Doug Shadow was the architect and he used</p> <p>22 to come to the house in a regular basis because we</p> <p>23 used to have a lot of projects going on.</p> <p>24 Q. Okay. Would you get advance notice when</p> <p>25 Mr. Epstein was going to arrive in Palm Beach?</p>	<p>17 MR. CRITTON: Form.</p> <p>18 BY MR. MERMELSTEIN:</p> <p>19 Q. And Ms. Maxwell?</p> <p>20 MR. CRITTON: Form.</p> <p>21 THE WITNESS: No, she will have different</p> <p>22 plane.</p> <p>23 BY MR. MERMELSTEIN:</p> <p>24 Q. Okay.</p> <p>25</p>

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<p style="text-align: right;">Page 70</p> <p>1 in cash as opposed to check?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: I was told to pay them</p> <p>4 cash, sir.</p> <p>5 BY MR. MERMELSTEIN:</p> <p>6 Q. Simply you were told and didn't ask why?</p> <p>7 A. No.</p> <p>8 Q. Do you recall telling the detective who</p> <p>9 interviewed you for the police that you thought of</p> <p>10 yourself as a human ATM machine?</p> <p>11 MR. CRITTON: Form.</p> <p>12 THE WITNESS: Yes.</p> <p>13 BY MR. MERMELSTEIN:</p> <p>14 Q. You recall saying that?</p> <p>15 MR. CRITTON: Form.</p> <p>16 THE WITNESS: Because I always had cash</p> <p>17 in my pocket.</p> <p>18 BY MR. MERMELSTEIN:</p> <p>19 Q. And why was there always cash in your</p> <p>20 pocket?</p> <p>21 A. That was part of my job to have, you</p> <p>22 know, for emergencies or paying somebody cash.</p> <p>23 Q. Okay. What kind of emergencies?</p> <p>24 A. It's hard to say. I was supposed to put</p> <p>25 cash on each Mercedes Benz on each ashtray. The</p>	<p style="text-align: right;">Page 72</p> <p>1 A. Not him. I will drive anybody else but</p> <p>2 he would rather eat at home.</p> <p>3 Q. So you would drive house guests to</p> <p>4 restaurants?</p> <p>5 A. Yes.</p> <p>6 Q. And when you did that you would -- didn't</p> <p>7 you stay with the car or did you eat with them?</p> <p>8 A. No, I will stay with the car.</p> <p>9 Q. So who did you tip?</p> <p>10 A. If you want to park in front of the</p> <p>11 restaurant you got to tip the valet otherwise</p> <p>12 you're taking one of the spots.</p> <p>13 Sometimes I used to take -- I'm sorry.</p> <p>14 Aviation, you know, you need to go to aviation and</p> <p>15 help those guys move your cars around, you need --</p> <p>16 they carry luggage, so I used to tip those too.</p> <p>17 Q. That would be when you picked up or</p> <p>18 dropped off Mr. Epstein. Correct?</p> <p>19 A. Yes.</p> <p>20 MR. MERMELSTEIN: We'll mark this as an</p> <p>21 exhibit, composite exhibit.</p> <p>22 (Composite Exhibit 1 was marked for</p> <p>23 Identification.)</p> <p>24 MR. CRITTON: Just out of curiosity, on</p> <p>25 depositions are we going to use instead of</p>
<p style="text-align: right;">Page 71</p> <p>1 idea behind this is you get stranded nobody accept</p> <p>2 credit card or check you have cash.</p> <p>3 Q. How much did you leave in the ashtray?</p> <p>4 A. 300.</p> <p>5 Q. And did you ever have to replenish that</p> <p>6 money?</p> <p>7 A. Yes.</p> <p>8 Q. Because the Mercedes was stranded?</p> <p>9 A. No, because when Mr. Epstein will leave I</p> <p>10 have to collect that money because I will send the</p> <p>11 cars to the car wash so to avoid that money being</p> <p>12 stolen we used to keep track, you know, when to</p> <p>13 retrieve that money and then when he's coming put</p> <p>14 it back there again.</p> <p>15 Q. So you use cash for that purpose and you</p> <p>16 also use cash to pay the masseuses. Correct?</p>	<p style="text-align: right;">Page 73</p> <p>1 doing plaintiff and defendant designations</p> <p>2 do you just want to run them one, two,</p> <p>3 three, four?</p> <p>4 MR. MERMELSTEIN: That's fine with me as</p> <p>5 long as we remember where we left off.</p> <p>6 MR. CRITTON: Well, are we going to do it</p> <p>7 consecutive with all of the depositions?</p> <p>8 I'm okay with that if someone can keep track</p> <p>9 of that.</p> <p>10 MR. EDWARDS: I've had that go wrong</p> <p>11 before, especially when we have some parties</p> <p>12 who aren't here, such as Mr. Garcia, he's</p> <p>13 going to join depositions, we have to start</p> <p>14 at 27 or whatever.</p> <p>15 MR. CRITTON: For each deposition one</p> <p>16 through whatever without necessarily giving</p> <p>17 them a plaintiff or defendant.</p>
<p>17 A. Yes.</p> <p>18 Q. Did you use cash for any other purpose?</p> <p>19 A. Car wash for the guy who used to come to</p> <p>20 the house and wash all the cars. Tipping</p> <p>21 sometimes for getting a good spot in the</p> <p>22 restaurant you have to have cash, something like</p> <p>23 that.</p> <p>24 Q. Okay. Would you drive Mr. Epstein to a</p> <p>25 restaurant?</p>	<p>18 BY MR. MERMELSTEIN:</p> <p>19 Q. Mr. Rodriguez, I've marked as Exhibit 1 a</p> <p>20 composite document which includes four per page of</p> <p>21 what appear to be message slips.</p> <p>22 First of all let me ask you, let me</p> <p>23 direct your attention to the first page of this</p> <p>24 exhibit. And the upper left message has initials</p> <p>25 at the bottom. Is that correct?</p>

19 (Pages 70 to 73)

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<p style="text-align: right;">Page 74</p> <p>1 A. Yes.</p> <p>2 Q. Are those your initials?</p> <p>3 A. Yes.</p> <p>4 Q. And was it the household policy to</p> <p>5 initial messages when they were taken?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. You were instructed to do that?</p> <p>8 A. Yes.</p> <p>9 Q. Who instructed you to do that?</p> <p>10 A. Ms. Maxwell. There was a manual, sir, in</p> <p>11 the house, we had to follow the instructions of</p> <p>12 the manual.</p> <p>13 Q. There was -- okay.</p> <p>14 A. Estate manager, household manager for all</p> <p>15 the houses, so I will abide to that, you know, so</p> <p>16 I take message with my initial, the time, who</p> <p>17 called.</p> <p>18 Q. So there were all sorts of policies and</p> <p>19 procedures in this manual?</p> <p>20 A. Yes.</p> <p>21 Q. Who wrote it?</p> <p>22 A. It was the estate manager for all the</p> <p>23 properties and so I was --</p> <p>24 Q. Who was the estate manager for all the</p> <p>25 properties?</p>	<p style="text-align: right;">Page 76</p> <p>1 and he told you he owned a modeling agency?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Anything else he told you?</p> <p>4 A. He spoke, you know, five, six languages,</p> <p>5 always speaking Spanish, Italian.</p> <p>6 Q. Did the girls who were -- you know, who</p> <p>7 travelled with Mr. Epstein, were they from his</p> <p>8 agency?</p> <p>9 MR. CRITTON: Form.</p> <p>10 THE WITNESS: I don't know, sir.</p> <p>11 BY MR. MERMELSTEIN:</p> <p>12 Q. You didn't discuss that?</p> <p>13 A. No.</p> <p>14 Q. Let's look at the message next to it.</p> <p>15 MR. CRITTON: Still on page one?</p> <p>16 MR. MERMELSTEIN: Still on page one.</p> <p>17 BY MR. MERMELSTEIN:</p> <p>18 Q. It appears the one under it is to the</p> <p>19 same person. Is that correct? Who is that?</p> <p>20 A. Alicia.</p> <p>21 Q. Who is Alicia?</p> <p>22 A. I don't know, sir. Please tell Jeffrey</p> <p>23 that I called so I just wrote the name.</p> <p>24 Q. Now, some of these messages if you look</p> <p>25 through appears to be a different handwriting and</p>
<p style="text-align: right;">Page 75</p> <p>1 A. I never met him, sir, he was fired before</p> <p>2 I came along.</p> <p>3 Q. But you don't remember his name?</p> <p>4 A. No, sir.</p> <p>5 Q. And you remember one of the things that</p> <p>6 said in this manual was that every message has to</p> <p>7 be signed?</p> <p>8 A. Yes.</p> <p>9 Q. I'm not necessarily going to go through</p> <p>10 every single message. Let me go back to the one</p> <p>11 on the upper left on the first page. It's from</p> <p>12 Jean-Luc. Is that correct?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Who is Jean-Luc?</p> <p>15 A. He had modeling agency.</p> <p>16 Q. How do you know that?</p> <p>17 A. He gave me his card, sir.</p> <p>18 Q. Was he a frequent guest at the house?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Did he stay over?</p> <p>21 A. Sometimes he will stay, sometimes I will</p> <p>22 drive him to Miami.</p> <p>23 Q. Do you recall his last name?</p> <p>24 A. No, sir.</p> <p>25 Q. And so you had a conversation with him</p>	<p style="text-align: right;">Page 77</p> <p>1 there is no signature on the bottom.</p> <p>2 A. That's not mine, I don't know who's that</p> <p>3 is, sir.</p> <p>4 Q. I thought you said earlier you were the</p> <p>5 one who was responsible for taking messages.</p> <p>6 A. Exactly, yes, I was, sir.</p> <p>7 Q. But there were other people who took</p> <p>8 messages as well?</p> <p>9 A. Maybe this is after or before my time,</p> <p>10 sir.</p> <p>11 Q. Okay. Because there is no date on it.</p> <p>12 A. I used to put my dates and I know I used</p> <p>13 to do that all the time, but you know.</p> <p>14 Q. These style of message pads. It was a</p> <p>15 pad. Correct?</p> <p>16 A. Yes.</p> <p>17 Q. And this is the old fashion message pad</p> <p>18 that it's like duplicate?</p> <p>19 A. Exactly, the original stays with the</p> <p>20 spiral.</p> <p>21 Q. Okay. So there was a spiral notebook?</p> <p>22 A. Exactly.</p> <p>23 Q. And you would write the message on the</p> <p>24 top copy and then you would take that out and put</p> <p>25 it on the counter in the kitchen?</p>

20 (Pages 74 to 77)

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<p style="text-align: right;">Page 150</p> <p>1 Q. You had a laptop?</p> <p>2 A. No, it was desktop.</p> <p>3 Q. Okay. So you had your own desktop in the</p> <p>4 staff house?</p> <p>5 A. Yeah. Exactly.</p> <p>6 Q. And you don't know what was -- what was</p> <p>7 the files in that computer versus on the other</p> <p>8 computers?</p> <p>9 A. No, sir.</p> <p>10 Q. Did you ever see any pornography on any</p> <p>11 of the computers?</p> <p>12 A. No, sir.</p> <p>13 Q. Are you sure about that?</p> <p>14 A. Pornography as in sexual acts, no.</p> <p>15 Q. Pornography as in naked people, men or</p> <p>16 women.</p> <p>17 A. Yeah, there were some.</p> <p>18 Q. Okay. And describe to me what that was.</p> <p>19 A. They were like models.</p> <p>20 Q. And where were those in the computer? I</p> <p>21 mean, how did you access that?</p> <p>22 A. They were in the files and some of it</p> <p>23 in -- you mean which file they were, what was your</p> <p>24 question?</p> <p>25 Q. Where were they in the computer? There</p>	<p style="text-align: right;">Page 152</p> <p>1 Q. The girls who came to the house for</p> <p>2 massages, did you ever call a cab to bring any of</p> <p>3 the girls home?</p> <p>4 A. Probably on a few occasions.</p> <p>5 Q. So is it your understanding that they</p> <p>6 would have arrived by cab as well?</p> <p>7 MR. CRITTON: Form.</p> <p>8 THE WITNESS: Yes.</p> <p>9 BY MR. MERMELSTEIN:</p> <p>10 Q. And how would that come about, were you</p> <p>11 given instructions to call a cab by anyone?</p> <p>12 A. No, I would call the cab, the taxi.</p> <p>13 Q. How did you know a cab needed to be</p> <p>14 called?</p> <p>15 A. Because Sarah would tell me can you get</p> <p>16 me a taxi.</p> <p>17 Q. So when the girl was finished what she</p> <p>18 was doing Sarah would come to you and say --</p> <p>19 A. She would call me.</p> <p>20 MR. CRITTON: Form.</p> <p>21 BY MR. MERMELSTEIN:</p> <p>22 Q. She would call you?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. You would be in the guest house at</p> <p>25 the time?</p>
<p style="text-align: right;">Page 151</p> <p>1 were downloaded files on computer?</p> <p>2 A. They were downloaded, yes.</p> <p>3 MR. CRITTON: Form.</p> <p>4 BY MR. MERMELSTEIN:</p> <p>5 Q. Okay. There were photographs of naked</p> <p>6 women?</p> <p>7 A. Models.</p> <p>8 Q. And why do you say models?</p> <p>9 A. Because it was like a catalog so you have</p> <p>10 models, you know.</p> <p>11 Q. And what was your understanding as a</p> <p>12 source of these photos?</p> <p>13 A. I don't know, sir. It was just a</p> <p>14 curiosity on myself and it was -- it was none of</p> <p>15 my business but, you know, I just happen to see</p> <p>16 them there.</p>	<p style="text-align: right;">Page 153</p> <p>1 A. Yes.</p> <p>2 Q. Do you recall having to do that often?</p> <p>3 A. No, not very often, sir.</p> <p>4 Q. Did Mr. Epstein keep photograph equipment</p> <p>5 in the house?</p> <p>6 A. I don't remember seeing it.</p> <p>7 Q. Do you recall seeing any video equipment?</p> <p>8 A. No, sir.</p> <p>9 Q. Do you recall any video or photograph</p> <p>10 equipment in the master bedroom?</p> <p>11 A. No, sir.</p> <p>12 Q. The models that you saw on the computer,</p> <p>13 did you recognize any of them as having been at</p> <p>14 the house?</p> <p>15 A. No.</p> <p>16 Q. The girls who stayed at the house, did</p> <p>17 any of them speak with a foreign accent?</p>
<p>17 Q. Did these girls appear very young to you?</p> <p>18 MR. CRITTON: Form.</p> <p>19 THE WITNESS: No, sir. They were young</p> <p>20 but not underage.</p> <p>21 BY MR. MERMELSTEIN:</p> <p>22 Q. Is there anything in particular that</p> <p>23 makes you draw that conclusion?</p> <p>24 A. Because they are developed, you know.</p> <p>25 It's hard to say, sir, you know.</p>	<p>17 A. Yes.</p> <p>18 Q. Many of them?</p> <p>19 MR. CRITTON: Form.</p> <p>20 THE WITNESS: Some of them.</p> <p>21 BY MR. MERMELSTEIN:</p> <p>22 Q. Would any of them not speak any English?</p> <p>23 A. No.</p> <p>24 Q. They all spoke English?</p> <p>25</p>

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<p style="text-align: right;">Page 166</p> <p>1 written down anywhere?</p> <p>2 A. No.</p> <p>3 Q. It's my understanding that C. and T.</p> <p>4 either came to his house alone to visit with Mr.</p> <p>5 Epstein or brought other girls in their age group</p> <p>6 to Mr. Epstein.</p> <p>7 Were you familiar with that type of</p> <p>8 recruitment process of girls bringing other girls?</p> <p>9 MR. CRITTON: Form.</p> <p>10 THE WITNESS: Yes.</p> <p>11 BY MR. EDWARDS:</p> <p>12 Q. Can you tell me more about what you know</p> <p>13 about girls bringing other girls that are</p> <p>14 relatively the same age to come to Jeffrey</p> <p>15 Epstein's house and to use your words, have a good</p> <p>16 time?</p> <p>17 MR. CRITTON: Form.</p> <p>18 THE WITNESS: It's hard to know who they</p> <p>19 knew. But I think that was -- they feel</p> <p>20 better themselves when they're in a group</p> <p>21 than going by themselves, but I don't know</p> <p>22 somebody recruiting.</p> <p>23 BY MR. EDWARDS:</p> <p>24 Q. Okay. And you've talked about, at least</p> <p>25 referred to yourself I believe to the police and</p>	<p style="text-align: right;">Page 168</p> <p>1 for now we'll call it a massage -- as well as</p> <p>2 anybody who brought that person over to the house,</p> <p>3 they would both get paid cash. Are you familiar</p> <p>4 with that?</p> <p>5 MR. CRITTON: Form.</p> <p>6 THE WITNESS: No.</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. If C. brought another girl over to the</p> <p>9 house and C. stayed downstairs but this other girl</p> <p>10 went upstairs with Mr. Epstein, which one would</p> <p>11 you pay?</p> <p>12 A. I don't know because I was told who to</p> <p>13 pay.</p> <p>14 Q. And Sarah Kellen always told you?</p> <p>15 A. Sarah told me pay so and so.</p> <p>16 Q. So if we were going to ask anybody else</p> <p>17 about the exact method in terms of who would get</p> <p>18 paid and for what, who would the people be? I</p> <p>19 mean, other than Mr. Epstein who else could we ask</p> <p>20 these questions?</p> <p>21 A. Sarah.</p> <p>22 Q. Sarah Kellen?</p> <p>23 A. Yes.</p> <p>24 Q. She would know this?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 167</p> <p>1 as well today as a human ATM machine. Right?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: Something like that. I was</p> <p>4 supposed to carry cash at all times.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. One of the primary reasons why you</p> <p>7 carried cash was to pay the girls in this age</p> <p>8 group of C. and T. for whatever happened at the</p> <p>9 house. Right?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: Yes.</p> <p>12 BY MR. EDWARDS:</p> <p>13 Q. That's a fair statement. Right?</p> <p>14 MR. CRITTON: Form.</p> <p>15 THE WITNESS: Yes.</p> <p>16 BY MR. EDWARDS:</p>	<p style="text-align: right;">Page 169</p> <p>1 Q. What about Ghislaine Maxwell?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: You're talking about the</p> <p>4 boss. I don't know.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. To your knowledge was Ghislaine Maxwell</p> <p>7 aware of these girls that are in the age group of</p> <p>8 C. and T. coming to Jeffrey Epstein's house to</p> <p>9 have a good time?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: I have to say something.</p> <p>12 Mrs. Maxwell called me and told me not to</p> <p>13 ever discuss or contact her again in a</p> <p>14 threaten way.</p> <p>15 BY MR. EDWARDS:</p> <p>16 Q. When was this?</p>
<p>17 Q. Okay. And when C., let's use her for</p> <p>18 example, would bring somebody else to the house,</p> <p>19 did you pay C. as well as whomever she brought to</p> <p>20 the house, pay them both?</p> <p>21 A. No, I pay only one person.</p> <p>22 Q. Okay. My understanding, and tell me if</p> <p>23 this is wrong or you can corroborate this, is that</p> <p>24 Mr. Epstein would pay the girl that was actually</p> <p>25 performing whatever was happening in the room --</p>	<p>17 A. Right after I left because I call one of</p> <p>18 the friends for a job and she told me this, but,</p> <p>19 you know, I feel intimidated and so I want to keep</p> <p>20 her out.</p> <p>21 Q. What exactly did she say? First of all,</p> <p>22 was this a telephone call?</p> <p>23 A. Yes, she was in New York.</p> <p>24 Q. She called you on your cell phone?</p> <p>25 A. Yes.</p>

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